REMARKS

In response to the Office Action mailed on August 20, 2008, Applicants respectfully request reconsideration. Claims 1, 4-13, 17-22, 25-31, 41, and 44-50 are pending in this application. Claims 1, 4-13, 17-22, 25-31, 41, and 44-50 are rejected. In this reply, claims 41 and 44-50 are canceled. Claim 13 is amended. Claim 13 was amended to address an issue under 35 U.S.C. § 101, as requested in the Office Action. The remaining claims are not being amended as Applicants respectfully submit the claims include limitations not taught or suggested by the cited prior art.

Claims 1, 11, and 13, are independent claims, and the remaining claims are dependent claims. Applicants believe that the claims as presented are in condition for allowance. A notice to this affect is respectfully requested.

Applicants respectfully request close attention to the following independent and dependent claims most likely to be subject of an appeal.

Rejections under 35 U.S.C. §103

Claim 1.

Claim 1 has been rejected under 35 U.S.C. §103 as being unpatentable over U.S. Patent No. 5,909,678 to Bergman et al. (Bergman), in view of U.S. Pub. No. 2002/0019844 to Kurowski (Kurowski), in view of U.S. Patent No. 6,654,737 to Nunez (Nunez) and in view of WC3, HTML 4.01 specification (WC3). Applicants respectfully traverse the rejection because the claims include limitations not taught or suggested by the cited prior art.

Claim 1 recites:

> displaying a hyperlink for an element in the form, the form being a
> database query, to indicate to a user that a control is available for the
> element, said hyperlink including at least one hyperlink target, the

hyperlink target identified by a link to a choice satisfying the element on the form, said hyperlink providing one of the group consisting of

(i) a link from the form to another location, wherein the another location is identified by a reference to valid variables in the hyperlink target and

(ii) a link from the form to another file, wherein the another file is identified by a reference to a selection of choices in the hyperlink target;

upon a selection of the hyperlink by the user, presenting the control for user interaction; and

upon completion of user interaction with the control, replacing the element with a new element responsive to user action.

Applicants respectfully submit that claim 1 includes patentable limitations over the cited prior art. For example, claim 1 recites "the hyperlink target identified by a link to a choice satisfying the element on the form." As recited by claim 1, the hyperlink target includes a link to a choice that satisfies a database query element.

To reject the claimed invention, the Office Action asserts that Bergman teaches "has a choice of objects and a choice of phrases" (column 4, lines 15-20), and "enforce semantic constraints…see the phrase and objects that the palette will accept highlighted in the menu boxes" (column 7, lines 30-49). The Office Action further asserts "Kurowski et al teach wherein activating hyperlinks generates menu views" (paragraph 184).

Hyperlinks described in the cited prior art direct a user from a source anchor to a destination anchor or web resource, such as an .HTML page. (WC3 12.1.1-12.1.3.) For example, a user clicking a hyperlink is taken to a different web page, or to a document, or to a different view or location in a web page. Nunez discloses the same idea in that hyperlinks allow a user to link or jump from one document to another document, or from one view to another view. (Nunez, col. 1 line 66-col. 2, line 17; col. 4, lines 18-34.) Kurowski teaches more of the same idea in that clicking on a hyperlink takes a user to a different view or web page, such as a "tools and programs settings menu properties view," or a "tools and network settings menu properties view." (Kurowski, paragraph [0184].) In other words, clicking on a hyperlink identified as, for example, "settings" returns another web page or another view for a user to change settings. Bergman is entirely silent on hyperlinks.

Bergman teaches a template that uses a drag and drop method of constructing queries. Kurowski, Nunez, and WC3 teach only that a hyperlink takes a user from a source reference/resource, to a destination reference/resource. In the case of Kurowski, clicking on a hyperlink takes a user from a first view to a destination view. In the destination view of Kurowski, a user can adjust settings on a computer, which are unrelated to a hyperlink to satisfy an element in a form. In contrast, Applicants claim "said hyperlink including at least one hyperlink target identified by a link to a choice satisfying the element on the form." In other words, the cited references as a whole do not teach the hyperlink to a choice that satisfies an element on the database query form. The cited references teach only a hyperlink taking a user to a different view or page.

In other words, Bergman teaches dragging and dropping of objects into queries. Kurowski, Nunez, and WC3 teach clicking on a hyperlink to yield different views. According to Kurowski, the new view can be used to "activate things" such as "to hide the Tray Icon, not operate the client in laptop battery mode, and adjust the percentage

of disk used by the client." Applicants respectfully submit that none of these actions satisfies a hyperlink element on a database query form.

Furthermore, claim 1 recites: "upon completion of user interaction with the control, replacing the element with a new element responsive to user action." In claim 1, clicking on the hyperlink for the element in the database query returns a choice to satisfy the element on the form, which then **replaces the hyperlink element with a new hyperlink element**. Applicants respectfully submit that the reference combination fails to teach or suggest this limitation because the reference combination fails to teach or suggest changing the hyperlinks themselves.

To reject the limitation of replacing the hyperlinked element with a new hyperlinked element, the Office Action asserts that Bergman teaches "user has dragged and dropped the object…from the object menu 11 into box 210", and that element 210 of Figure 2 is replaced in Figure 3. As discussed above, Bergman is entirely silent on hyperlinks, and the remaining references disclose use of hyperlinks to jump from one location to another.

Figure 2 of Bergman illustrates element 210 as an empty box. Figure 3 of Bergman illustrates element 210 containing the word "FIRES." The remaining references disclose only known hyperlink actions. In paragraph 184 of Kurowski, clicking on a hyperlink can "activate things." Kurowski provides a new view with several choices to activate things such as tray icons, battery settings, and disk usage. Kurowski teaches "changes made here are queued to the Task Server 1200. A Member, Team and Projects (goes to system web site) hyperlink may be used to start the default web browser and takes the user to the system member's web site. A Send to a Friend (formats an email message to send hyperlink) hyperlink may be used to start the default email client and pre-format an email message with an invitation to join the member's team (if any)." In other words, clicking on a hyperlink in Kurowski can be used to execute actions unrelated to the hyperlink element name itself. Kurowski is silent on

changing the hyperlink element itself as part of a database query. Selecting choices in Kurowski changes computer settings or system settings, and not a hyperlink element. Thus, none of the cited prior art references discloses or suggests replacing the hyperlink element with a new hyperlink element. Additionally, the cited prior art references do not teach or suggest that it would be useful to replace the hyperlinked elements themselves.

The Applicant's invention is useful over the cited prior art. For example, a hyperlink element target identified by a link to a choice that satisfies the element on the form and replaces the hyperlink element, means that an equation can be presented in a simple, readable format, while maintaining editability. This is a useful improvement over a complicated drag and drop style of display.

As an example use or embodiment of claim 1, an element in a database query form is a hyperlink showing the text "Top 10" as part of a database query for "Top 10 based on Direct Cost." By clicking on the hyperlink "Top 10", a user can see a choice of additional variables to satisfy this element. One such choice might be "Bottom 5." According to claim 1, in this example embodiment, selecting "Bottom 5" would change the hyperlinked element itself from "Top 10" to "Bottom 5." The reference combination does not disclose such functionality.

Accordingly, Applicants respectfully submit that claim 1 is in condition for allowance. Applicants respectfully request the rejection under 35 U.S.C. §103 be withdrawn.

Claim 11.

Claim 11 has been rejected under 35 U.S.C. §103 as being unpatentable over U.S. Patent No. 5,909,678 to Bergman et al. in view of U.S. Pub. No. 2002/0019844 to Kurowski, in view of U.S. Patent No. 6,654,737 to Nunez, and in view of WC3, HTML

4.01 specification. Applicants respectfully traverse the rejection because claim 11 includes limitations not taught or suggested by the cited prior art.

Claim 11 claims a computer system, instead of a method as in claim1. Claim 11 includes limitations similar to those in claim 1. Claim 11 further recites: "a hyperlink displayed on the user interface for an element in the form, **the form being a spreadsheet**, to indicate to the user that a control is available for the element."

In rejecting the claimed invention, the Office Action groups claims 1 and 11 and gives one rationale. The Office Action does not specifically address that hyperlinks of elements appear in a form that is a spreadsheet.

Bergman is silent on spreadsheets. WC3 is silent on spreadsheets. Kurowski is silent on spreadsheets. Nunez discloses spreadsheet twice only: "It is widely known that 90% of the world's information is stored in the form of emails, faxes, reports and word processing documents. The remaining 10% is stored in spreadsheets and databases. The 90% portion is considered 'un-structured' and 'chaotic' and cannot be easily modeled using the 'row and column' format of spreadsheets and databases." Nunez discloses spreadsheets as a means to store data, but does not disclose hyperlink elements in a query form that is a spreadsheet. Therefore, Applicants respectfully submit that claim 11 is further patentable over the cited reference combination.

Accordingly, Applicants respectfully submit that claim 11 is in condition for allowance. Applicants respectfully request the rejection under 35 U.S.C. §103 be removed.

Claim 13.
Claim 13 claims a computer product. Claim 13 contains elements substantially similar to claim 1, and was rejected by the Office Action under the same rationale as in

claim 1. Applicants respectfully submit that claim 13 is patentable over the reference combination under the rationale as explained above for claim 1.

Claims 4-10, 12, 17-22, and 25-31.

Claims 4-10, 12, 17-22, and 25-31 have been rejected under 35 U.S.C. §103 as being unpatentable over U.S. Patent No. 5,909,678 to Bergman et al. in view of U.S. Pub. No. 2002/0019844 to Kurowski (Kurowski '844), in view of U.S. Patent No. 6,654,737 to Nunez (Nunez '737) and in view of WC3, HTML 4.01 specification (WC3). Claims 4-10, 12, 17-22, and 25-31 are all dependent claims and each depend on either claim 1, 11, or 13. Each of claims 4-10, 12, 17-22, and 25-31 fully incorporate the limitations of their corresponding independent claims, and are therefore patentable over the reference combination under the same rationale for claim 1 being patentable. Thus, Applicants respectfully request the rejections under 35 U.S.C. §103 for claims 4-10, 12, 17-22, and 25-31 be withdrawn.

Rejections under 35 U.S.C. §101

Claims 13, 25-31, 41, and 44-50 are rejected under 35 U.S.C. § 101 as the Office Action asserts that these claims contain non-statutory subject matter. The Office Action requested appropriate correction. The claims are amended accordingly.

Claims 13 and 25-31.

The preamble of claim 13 was amending to recite: "A computer program product for editing a form, the form being a database query, the computer program product comprising a computer ~~usable~~storage medium having computer readable code thereon, including program code which." Support for this amendment is found in the specification on page 5, lines 7-15. Claim 13 claims a physical product that includes a storage medium. A computer storage medium is tangible. In other words, claim 13 claims a physical article of manufacture. Applicants respectfully submit that an article of manufacture falls within a statutory category of invention, and therefore claim 13 defines

statutory subject matter. Applicants submit that claims 25-31 define statutory subject matter by virtue of dependency. Therefore Applicants respectfully request that the rejection under 35 U.S.C. § 101 be withdrawn.

Claims 41 and 44-50.

Claims 41 and 44-50 have been canceled in this amendment. Thus the rejection of claims 41 and 44-50 under 35 U.S.C. § 101 is now moot.

Summary

Applicants respectfully submit that the claims in the subject application are patentable over the reference combination because the reference combination fails to teach or disclose all of the features of the claimed invention. Thus, Applicants submit that the pending claims are in condition for allowance.

Applicant(s) hereby petition(s) for any extension of time which is required to maintain the pendency of this case. If there is a fee occasioned by this response, including an extension fee, that is not covered by an online payment made herewith, please charge any deficiency to Deposit Account No. 50-3735.

If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned collect at (508) 616-9660, in Westborough, Massachusetts.

Respectfully submitted,

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